IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

TRUSTEES OF THE SUBURBAN TEAMSTERS)
OF NORTHERN ILLINOIS PENSION FUND)
Plaintiff,)
) No. 08 C 788
V.) Judge Coar
ROSELLE FARMERS LUMBER COMPANY)
an Illinois corporation,) Magistrate Judge Cox
Defendant.)

MOTION FOR JUDGMENT IN SUM CERTAIN

NOW COMES the Plaintiff, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS PENSION FUND, by and through its attorney, JOHN J. TOOMEY, ARNOLD AND KADJAN, and pursuant to FRCP 55 move for entry of a default judgment in sum certain as stated in this Complaint and the supporting Affidavits attached hereto. In support of its Motion, Plaintiffs state as follows:

- 1. Suit was filed on February 8, 2008 for collection of delinquent contributions, attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2).
- 2. Corporate service was made upon ROSELLE FARMERS LUMBER COMPANY, an Illinois corporation, on February 28, 2008 and a copy of the proof of service was filed with the court on March 5, 2008.
- 3. Defendant is now in default as to the Complaint and as supported by the attached Affidavits the sums due are:

\$81,614.00 Pension \$925.00 Attorneys fees \$46.00 Court costs \$85,181.00 WHEREFORE, Plaintiff prays for the entry of judgment against Defendant,
ROSELLE FARMERS LUMBER COMPANY, an Illinois corporation, and in favor of
Plaintiff, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS
PENSION FUND in the amount of \$85,181.00.

TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS PENSION FUND

By:

One of Its Attorneys

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